

From: [Rafael Casanova](#)
To: [Gloria-Small Moran](#)
Cc: [Chuck Talton](#); [Gary Moore](#)
Subject: NORCO's Proposal
Date: 08/11/2003 02:19 PM

Gloria, following are my comments on NORCO's proposal (dated July 25, 2003) for work at the Site.

NORCO states that, "much of the RI/FS cannot be performed until the surface features including tanks, piping and refinery equipment are removed." I disagree with this statement. The Removal Action and a large part of the RI/FS can occur simultaneously. We could possibly divide the Site into Operable Unit 1 and 2. OU 1 could be the soils in vicinity of the tank/refinery area. These soils could be addressed, to the greatest extent possible, during the removal action. Any work needed after the removal action could be addressed during the RI/FS and Record of Decision for OU 1 or 2 or both. OU 2 could include the ground water and surface water (including sediments) for the entire Site. The work needed to address the surface water, ground water, and sediments of OU 2 would not interfere with the removal action.

Thanks.

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Assigned Sites:

Brine Service Company Superfund Site (Corpus Christi, Texas) -
<http://www.epa.gov/earth1r6/6sf/pdf/brine.pdf>
Falcon Refinery Site (Ingleside, Texas) -
<http://www.epa.gov/earth1r6/6sf/pdf/falcon.pdf>
Many Diversified Interests, Inc. Superfund Site (Houston, Texas) -
<http://www.epa.gov/earth1r6/6sf/pdf/mdi.pdf>
Star Lake Canal Superfund Site (Port Neches, Texas) -
<http://www.epa.gov/earth1r6/6sf/pdf/starlake.pdf>



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